

**Comments to SCAQMD Mobile Source and Stationary Source Committees  
Regarding Fine Particulate Matter Health Effects  
and 2012 Air Quality Management Plan**

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January 18, 2013

1) The 2012 AQMP should comply with all provisions of California Health and Safety Code Section 40471 (b). Particularly important is the provision for at least one SCAQMD Governing Board hearing specifically devoted to the "report and peer review" of "the health impacts of particulate matter air pollution [PM] in the South Coast Air Basin [SCAB]." (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40460-40471> ). No such hearings have ever been held, although they were supposed to be held in 2001, 2004, 2007, 2010, and 2013.

2) The 2012 AQMP Appendix I Health Effects (<http://www.aqmd.gov/aqmp/2012aqmp/DraftFinal/appI.pdf>) seriously misrepresents and exaggerates the health effects and health impacts of PM in the SCAB and does not properly recognize the overwhelming evidence of NO relationship between PM (PM2.5 and PM10) and total mortality ("premature deaths") in the SCAB and California, as summarized in my 2012 ASA paper (<http://scientificintegrityinstitute.org/ASAS092812.pdf>).

3) Many of the misrepresentations and exaggerations in the 2012 AQMP Appendix I Health Effects are also present in the 2003 AQMP and the 2007 AQMP. For more than one decade the AQMD staff has failed to properly address the serious criticism that has been raised about the AQMP Appendix I Health Effects. This criticism dates back at least to January 6, 2002 and February 8, 2002 letters from Advisory Council members to SCAQMD Executive Officer Barry Wallerstein ( [http://www.aqmd.gov/aqmp/docs/prelim\\_draft\\_append%20I-health%20effects%20-Attachment%201%20Comments.pdf](http://www.aqmd.gov/aqmp/docs/prelim_draft_append%20I-health%20effects%20-Attachment%201%20Comments.pdf) ).

4) The 2012 AQMP Socioeconomic Report (<http://aqmd.gov/aqmp/2012aqmp/DraftFinalSocio.pdf>) is severely flawed and must be redone by objective statisticians and economists. Table 3-4 on page 3-8 claims to show "the number of avoided cases (or person-days) by health effect when the Basin attains the PM2.5 standard in 2014 and in 2023," with about 98% of the unit monetary value due to "mortality (adult and infant)." However, the unit monetary value for mortality is illusory because no deaths that will be avoided "when the Basin attains the PM2.5 standard." There is overwhelming evidence of NO relationship between PM and "premature deaths" in the SCAB and California, as cited above.

5) Until the numerous serious concerns that have raised about the 2012 AQMP are properly addressed, the SCAQMD Governing Board should not adopt any new regulations based on the 2012 AQMP. In particular, there needs to be a 2013 Board hearing on PM health impacts in the SCAB, as per CHSC 40471 (b).

6) The Board needs to put the 2012 AQMP in perspective in light of these two highly relevant facts: 1) As of 2009 the SCAB had an age-adjusted total death rate lower than the death rate in every state except Hawaii and 2) as of September 2012 the SCAB had an unemployment rate higher than every state except Nevada and Rhode Island.

My full comments regarding the 2012 AQMP are 1) items U and NN in AQMP Public Comment Letters (<http://www.aqmd.gov/aqmp/2012aqmp/commentletters/commentlist.html>), 2) pages 208-218 and pages 224-234 of AQMP Appendix I (<http://www.aqmd.gov/aqmp/2012aqmp/DraftFinal/appI.pdf>), and 3) pages 690-700 and later pages of the 4028-page Draft Final 2012 AQMP ( <http://www.aqmd.gov/hb/attachments/2011-2015/2012Dec/2012-Dec7-030.pdf>).

<http://www.bakersfieldcalifornian.com/opinion/our-view/x1801510372/Time-to-revamp-the-Clean-Air-Act>

**The Bakersfield Californian    December 2, 2012**

**Editorial: Our View [Partial]: [Time to revamp the Clean Air Act](#)**

Can you imagine banning all vehicles in the San Joaquin Valley? Or how about an all out prohibition on combustion of fossil fuels in the region? . . . What would happen if Los Angeles had to prohibit a quarter of its population from driving each day?

These are some of the more draconian requirements that would have to be imposed in order for the San Joaquin Valley and other regions of California and the country to meet the goals of the federal Clean Air Act as a result of antiquated provisions and various court rulings. . . .

As well-intentioned as the Clean Air Act is, we simply can't imagine that Congress, which approved the original 1970 Clean Air Act with just a single no vote in both houses, and which gave overwhelming bipartisan approval to major updates to the act in 1990, ever intended some of the consequences the law has created today. . . .

The San Joaquin Valley has a huge stake in the continued success of the Clean Air Act, but that success will require reforms and updates. The situation faced by air districts like the valley's and the numerous court rulings that have complicated implementation of the act warrant serious and prompt attention from federal lawmakers. . . .